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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 UNITED STATES OF AMERICA,)	CASE NO. CR 20-71406 MAG
14 Plaintiff,)	
15 v.)	DECLARATION OF MOHIT GOURISARIA IN
16 ADRIAN KYLE BENJAMIN,)	SUPPORT OF UNITED STATES' MOTION TO
17 Defendant.)	ORDER DEFENDANT DETAINED
)	
)	
)	

19 I, Mohit Gourisaria, declare and state as follows:

- 20 1. I am an Assistant United States Attorney for the Northern District of California. I am
21 assigned to the prosecution of the above-captioned case.
- 22 2. Attached hereto as **Exhibit A** is a true and correct copy of a transcript of the detention
23 hearing held before the district court (Hon. Edward M. Chen) on October 14, 2020.
- 24 3. On October 16, 2020, I spoke with Maria Richard, Facility Director at the halfway house in
25 San Francisco (Taylor Street Center). During that conversation, Ms. Richard, the most senior
26 administrator at the halfway house, provided the following information:
- 27 a. The halfway house has approximately 37 employees, 15 of whom are assigned to
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1 security roles. Every employee, however, receives security training.

- 2 b. The halfway house has 105 rooms; the occupancy per room varies between 2 and 6. It
3 has the capacity to hold approximately 230 residents.
- 4 c. Every room at the halfway house is searched at least once per month. An effort is
5 made to monitor the sex-offender population more closely, but there are no cameras
6 in the rooms.
- 7 d. Residents at the halfway house typically are permitted one personal mobile phone
8 and, with authorization from Pretrial Services, a personal laptop. Additionally, one
9 television is permitted per room.
- 10 e. The halfway house does not provide Wi-Fi in the rooms, but residents are known to
11 access the Internet via Wi-Fi that is publicly available as well as through hotspots.
- 12 f. The halfway house offers a communal computer lab that is monitored both by a staff
13 member and “Net Nanny,” a content-control software. There also is one unmonitored
14 computer, which can be used only for medical-treatment sessions.
- 15 g. Deliveries for residents are inspected. But residents have been able to sneak in
16 unauthorized items, including (memorably) a six-foot teddy bear and a dresser.
- 17 h. Though the halfway house “somewhere between loosely and tightly monitor[s]” its
18 residents, there have been several occasions where residents were found with
19 unauthorized electronic devices such as tablets and laptops.
- 20 i. Residents in the past have found the means to commit new offenses from the halfway
21 house (including sex offenses, robberies, and drug sales).

22 I declare under penalty of perjury under the laws of the United States that the foregoing is true
23 and correct. Executed this 19th day of October, 2020.

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25 /s/ Mohit Gourisaria
26 MOHIT GOURISARIA
27 Assistant United States Attorney
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